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April 20, 2020

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Jane Doe, et al. v. The Trump Corp., et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

Pursuant to this Court's Order dated April 9, 2020 (ECF Doc. No. 230), we write on behalf of non-parties Anne Archer Butcher and Dolphin Entertainment (together, the "Non-Parties") in response to Stephanie E. Niehaus's letter to the Court dated April 8, 2020.

Any relevant documents in the Non-Parties' possession, custody, or control were created and/or received by Ms. Butcher in her capacity as a consultant to ACN. Most, if not all, of these documents are also in the possession, custody, or control of (i) Defendants, who presumably have already produced or will produce them in the normal course of discovery; and/or (ii) ACN, which objects to production of these documents and is prepared to file a motion to quash Plaintiffs' subpoenas to the Non-Parties and/or for a protective order. (ECF No. 230.)

On April 9, 2020, this Court stayed any production of the Non-Parties pending further Order of this Court. (*See id.*) Thereafter, Defendants and ACN requested a stay of all proceedings in this action, including discovery, pending their appeals of this Court's denial of their motions to compel arbitration. (ECF Nos. 237 & 244.) Accordingly, the Non-Parties will stay any production pending resolution of these motions and further Order of this Court.

We are available at the Court's convenience to address this matter further.

Respectfully submitted,

/s/ Deana Davidian

cc: All Counsel of Record (via ECF)